

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-54 through 61]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 26, 2011

Respectfully submitted,

N20111I54

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-54 Please refer to your response to Interrogatory DBP/USPS-42. Under what circumstances would it be deemed appropriate to utilize the procedure specified in the original hypothetical and under what circumstances would it be deemed inappropriate to do so?

DBP/USPS-55 Please refer to your response to Interrogatory DBP/USPS-43 subparts [a] and [b].

[a] Please explain why the Approved Shipper is authorized to provide a receipt for a Certified mailpiece but not for a Certificate of Mailing.

[b] Please confirm, or explain if you are unable to confirm, that all Approved Shippers will accept all of the categories of mail listed in subpart [a] of the response.

DBP/USPS-56 Please refer to your response to Interrogatory DBP/USPS-43 subparts [c] through [e].

The original Interrogatory refers to the ability to purchase all quantities of all denominations of postage stamps and not to the method by which an Approved Shipper applies postage to a mailpiece.

DBP/USPS-57 Please refer to your response to Interrogatory DBP/USPS-43 subparts [f] and [g].

Subpart [f] of the original response refers to complimentary packaging and Subpart [g] refers to selling packaging. What type of packaging is sold?

DBP/USPS-58 Please refer to your response to Interrogatory DBP/USPS-44 subpart [b].

[a] Approximately what percentage of all Consignment operations only sell Forever Stamp [or the corresponding denominated stamp] booklets?

[b] Approximately what percentage of all Consignment operations only sell Forever Stamp [or the corresponding denominated stamp] rolls?

[c] Approximately what percentage of all Consignment operations sell both Forever Stamp [or the corresponding denominated stamp] booklets and rolls?

[d] Approximately what percentage of all Consignment operations sell other denominations or formats of stamps? Please provide details of what do sell.

DBP/USPS-59 Please refer to your response to Interrogatory DBP/USPS-46.

[a] Please confirm, or explain if you are unable to confirm, that there have been no guidelines issued by Headquarters other than the single section of the Postal Operations Manual.

[b] Please provide any explanation that exists why the percentage of available Saturday retail window service varies among Districts as it does when all of the Districts are using the same criteria.

DBP/USPS-60 Please refer to USPS-LR-N2011-1/6.

- [a] Please advise the full heading for columns 4 through 8.
- [b] How was column 8 calculated?
- [c] What use is made of the value shown in column 8?
- [d] On what basis are the individual offices sorted in the printout?
- [e] What is the significance, if any, of the last eleven pages of the Library Reference that are blank except for the reference number?

DBP/USPS-61 Please refer to USPS-LR-N2011-1/6.

- [a] Please advise the full heading for columns 4 through 8.
- [b] How was column 8 calculated?
- [c] What use is made of the value shown in column 8?
- [d] On what basis are the individual offices sorted in the printout?